



CEILING INCREASE ACTION MEMORANDUM

DATE: 06/26/91

SUBJECT: Request for a Ceiling Increase for the Drexler-RAMCOR,
Orting WA ACTION MEMORANDUM

Site/Spill-ID: TGB10N5J7

Category of Removal: Time Critical

FROM: Chris D. Field, OSC

TO: Charles E. Findlay, Director
Hazardous Waste Division

THRU: Philip G. Millam, Chief, Superfund Branch *PM*
James M. Everts, Chief, ~~Superfund~~ *JE*
Superfund Response and Investigations Section

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of a Ceiling Increase of \$775,000 for a new total of \$1,455,000, to resume and complete the Drexler-RAMCOR removal action. The site is located in a rural area approximately 3 miles south of Orting, at 21716 Orville Road East, Orting, WA.

II. SITE CONDITIONS AND BACKGROUND

A. Removal Site Evaluation

The Original Action Memorandum was approved on September 26, 1990, and the removal action commenced on-site on November 13, 1990.

Originally built as an oil recycling facility, oil was stored and blended on-site in preparation for resale. Of twenty six tanks on-site, ten were contained inside a concrete containment structure (concrete berm) and sixteen others were spread over an approximate 3 acre area. The tanks, ranging in size from 4,000-15,000 gallons included; underground storage tanks stood on end; tractor-trailer tanks; railroad tanker cars; and oil delivery trucks. None of the tanks were secured, the vertical tanks were unstable and at risk of tipping over. There was abundant evidence of leaking tanks and frequent spills. See original Action Memorandum (attached).

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B. Others Actions to Date

1. Previous Actions

When the EPA initiated clean up activities in November 1990, there was an estimated 50,000 gallons of oil/water mix in tanks and standing in the berm. EPA contractors separated the water and oil, treated the water for solvent and hydrocarbon contamination and transported off-site for further treatment and discharge.

From late 1988 through 1990 the Owner and Operators periodically pumped the contaminated liquid from the berm into on-site tanks, as indicated by the water/oil mix in all tanks on-site. The EPA responded to a release at the facility on October 18, 1990 where a tank was overflowing as the operators attempted to pump liquid standing in the berm in to a tank that was already full. The EPA had responded to a similar emergency at the facility in January of 1990.

The vertical height of tanks in the concrete berm prevented the construction of any kind of shelter. Rainfall collecting in the concrete berm became contaminated from leaking tanks, and had to be treated. This increased the volume of contaminated water by an estimated 50,000 gallons during the first month on-site. The contaminants of concern and average pre-treatment levels were acetone (80.5 ppm), 2-butanone (17 ppm), toluene (35 ppm) and xylenes (32 ppm). On-site treatment with carbon and particulate filtration was effective for all contaminants except acetone, which made off-site treatment necessary.

The record rainfall and contaminated water problem was not anticipated and thus not included in the original scope of work. This unanticipated activity consumed a month of on-site work and an estimated \$150,000. It is important to note that had the EPA not been mobilized during this time, it is unlikely that the operators of the facility had the capacity to contain the massive contaminated water problem.

The actions completed to date are summarized as follows: An estimated 35,000 gallons of contaminated water, waste oil and sludge from 26 on-site tanks have been consolidated into 3 tanks and 180 drums that presently remain on site awaiting treatment/disposal at a RCRA approved facility. Another 50 drums found on site have been sampled and consolidated in the appropriate waste stream. The waste streams consist of PCB oil, total halogen oil (>1000 ppm), contaminated sludge and solvent contaminated water. Twenty-one of the twenty-six tanks have been steam-cleaned and then cut up for scrap.

2. Current Conditions

The 5 remaining tanks on-site are being used for storage of contaminated oil and water awaiting disposal. The concrete pad has been cleared of tanks and debris, steam cleaned and covered

with visqueen so there is no water accumulation or contamination. With the additional funds being requested the EPA will dispose of contaminated liquids, 3 expired carbon filters and excavate and dispose of 2 identified areas of soil contamination. The concrete pad, which passed TCLP tests, will be cleaned and left in place.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare.

Several persons (including at least 2 children) reside in trailers in close proximity to the former site and the children have been observed on site. These residents obtain water for domestic use from a shallow well located approximately 500 feet up-gradient (south) of the site. The well draws from a saturated zone within 8 feet of ground surface. Toluene has been detected in one residential water sample collected by EPA, although below the safe drinking water standards.

EPA soil sampling results show two areas where volatile analytes exceed the cleanup levels for residential soils, specified in the Washington State Model Toxics Control Act (MTCA), State ARAR. The analytes and respective concentrations are:

Analyte	Concentration (ppm)	MTCA Cleanup Level (ppm)
=====	=====	=====
xylenes	82	20
1,1,1 trichloroethane	70	20
benzene	29	.5
methylene chloride	34	.5
toluene	230	40
ethyl benzene	28	20

To confirm the Extent of Contamination (EOC) results the samples were also analyzed for Total Petroleum Hydrocarbons (TPH). The results showed TPH levels exceeding the State MTCA criteria (200 ppm) in the same two areas, showing a maximum concentration of 35,000 ppm. One location is the southeast corner of the concrete berm where a hole was discovered in the sump wall, below the level of standing liquids. The other location is a small depressed area approximately 100 feet due east of the concrete berm. This appears to be an area where substantial dumping took place.

Common uses of the above volatile organic compounds include solvent and degreasing applications, and some are constituents of automobile and aviation fuels. Methylene chloride and benzene are listed as carcinogens. Many of these compounds present similar potential health effects ie., irritation of eyes, skin and upper respiratory track and prolonged exposure causing potential damage

to kidneys, liver, lungs and central nervous system.

Based on the criteria set forth in the State MTCA these contaminants found to exceed the State cleanup levels, pose an unacceptable risk in the event of public exposure.

B. Threats to the Environment

The facility is located on the Puyallup River Flood Plain within 500 feet of the current river channel. Although much of the area has been filled with gravel, the entire area is wetland. Surface drainage tends to the north to a pond, which is also spring fed.

EPA surface water analysis has shown some contamination of the pond to the north of the site. Soil contaminants may be transported through leaching to groundwater and erosion to surface waters. Area geological observations would indicate a susceptibility to both of these phenomenon. Vegetation is dead or non-existent in both of the contaminated areas identified above. Continued leaching and migration of the contaminants of concern could further damage the sensitive wetland ecosystem.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COST

Removal of the consolidated waste streams for off-site incineration is the only feasible alternative for the contaminated liquids and sludge presently stored on-site. The estimated 35,000 gallons is not a sufficient volume to warrant on-site treatment or incineration. The removal of waste liquids and contaminated soils (to State ARAR criteria) will afford maximum feasible protection of public health and the environment, and eliminate any need for restricted use or controlled access.

A. Proposed Actions

Disposal arrangements will be made for the estimated 25,000 gallons of consolidated liquid wastes and 180 drums of sludge. An estimated 300 cubic yards of contaminated soils will be excavated from the two identified areas. The soil will be treated off-site to meet variance standards and will be disposed of at an EPA approved facility. The concrete pad will remain in place once the walls are removed and it is thoroughly cleaned. The east wall of the sump will be removed to prevent the accumulation of water and associated hazards. The sump and the other excavated areas will be backfilled and restored to pre-removal grade.

Summarized Scope of Work:

- o Arrange for off-site treatment and disposal of contaminated liquids, soils and carbon filters.
- o Excavate and remove contaminated soils to meet State residential clean-up levels.
- o Remove walls from concrete pad, east wall of sump (b.g.s.), and steam clean entire pad.
- o Backfill excavated and sump areas to pre-removal grade.
- o Remove fence and demobilize.

For a detailed analysis of the proposed project cost, see the enclosed cost projection. Briefly summarized, the estimated costs required to complete this removal action are as follows:

	<u>Costs to Date</u>	<u>Proposed Increase</u>	<u>Total</u>
ERCS	525,000	665,000	1,190,000
TAT	105,000	75,000	180,000
EPA	<u>50,000</u>	<u>35,000</u>	<u>85,000</u>
	680,000	775,000	1,455,000

VI. RECOMMENDATION

Site conditions continue to meet the NCP section 300.415(b) (2) criteria for a removal, and I recommend approval of the proposed increase of \$775,000. The total project ceiling if approved will be \$1,455,000, of which 100% will be funded from the regional allowance.

APPROVAL: _____

Charles Felly

DATE: _____

6/28/91

DISAPPROVAL: _____

DATE: _____

TIMELINE FOR PROPOSED CLEANUP ACTIVITIES

TASK	WEEK	1	2	3	4	5
	>					
1. Arrange for disposal of contaminated liquids, sludges, soil and expired carbon filters.	====>					
2. Pump and remove liquids and sludges.	=====>					
3. Cut, clean and scrap remaining tanks.	=====>					
4. Excavate and dispose of contaminated soil.	=====>					
5. Remove west side of sump wall and entire berm wall and steam clean the concrete pad.	====>					
6. Backfill sump and excavated areas, remove fence and demobilize	====>					

PROPOSED CLEANUP ACTIVITIES UNDER CEILING INCREASE

Drexler / RAMCOR
Orting, WA

TASK	RESOURCE	TIME (WKS)
1. Arrange for disposal of contaminated liquids, sludges, soil and expired carbon filters.	ERCS	1
2. Pump and remove liquids and sludges.	ERCS	.5
3. Cut, clean and scrap remaining tanks.	ERCS	1
4. Excavate and dispose of contaminated soil.	ERCS	1
5. Remove west side of sump wall and entire berm wall and steam clean the concrete pad.	ERCS	.5
6. Backfill sump and excavated areas, remove fence and demobilize	ERCS	.5